

LAW OFFICES OF
DONNA R. NEWMAN
ATTORNEY AT LAW
20 VESEY STREET, SUITE 400
NEW YORK, NEW YORK 10007
TEL. 212-229-1516
FAX 212-676-7497
DONNANEWMANLAW@AOL.COM
MEMBER: N.Y. & N.J. BAR



September 14, 2021

Via ECF & Email

The Honorable George B. Daniels
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels U.S.D.J.

Date: SEP 15 2021

Re: United States v. Goodman, Robert Baley, et al.
S4 20 cr 57 (GBD)

Dear Judge Daniels:

Currently, the defense pretrial motions are to be filed on or before September 16, 2012. I respectfully request an extension of time to file pretrial motions on behalf of Mr. Baley. A proposed schedule is set forth below. The Government consents to this request and to the proposed schedule.

Discovery in this case is voluminous and is still being produced, particularly as to Mr. Baley. Mid-August counsel received an extensive discovery production concerning Mr. Baley's Instagram account and social media. I have not completed my review of this discovery as I was on vacation during August. Review of this discovery will affect my decision on the motions to file. The additional time will allow Mr. Baley to review the new discovery which he has not had a chance to review and to discuss it with counsel. The requested additional time to file pretrial motions will also allow counsel to also explore a disposition of the case short of trial.

We propose the following pretrial motion schedule:

Mr. Baley pretrial motion to be filed on or before November 11, 2021;
The Government's Response is to be filed on or before December 16, 2021
Mr. Baley shall file his Reply on or before December 30, 2021.

Respectfully submitted,

/s/

Donna R. Newman

Cc: Counsel of Record via ECF

AUSA Michael Longyear & AUSA Peter Davis & AUSA Jacob Warren via email

